



February 3, 2022

VIA EMAIL

FCcommunications@gofundme.com

Attention: Brad Damphousse and Andrew Ballester
Go Fund Me

Dear Sirs:

RE: Freedom Convoy 2022 Finance Committee Go Fund Me Campaign

Please be advised that the Justice Centre for Constitutional Freedoms ("Justice Centre") has been retained by the Freedom Convoy 2022 Finance Committee (the "Ottawa Convoy"). I have been retained by the Justice Centre as external lead counsel in this matter. We have been provided with the recent inquiries Go Fund Me has emailed to the Ottawa Convoy committee and can advise as follows.

The Ottawa Convoy members who signed the Go Fund Me agreement are:

Tamara Lich, President

Cindy Parker, Secretary

Helen Gazica, Bookkeeper

Kristina Kenyon, Bookkeeper

Noeline Villebrun, First Nations advisor

(the "Committee")

We can advise that on January 30, 2022, Chad Eros, a chartered professional accountant, CPA, to incorporate a federal not-for-profit incorporation under the Canada Not-for-profit Corporations Act under the name of "Freedom 2022 Human Rights and Freedoms" ("Convoy Corp" and "Freedom 2022"). Articles of Incorporation were filed with the federal corporate registry with two provisional directors (see attached).

On January 31, 2022, the provisional directors set up a bank account for Convoy Corp with a financial institution. The financial institution is currently completing its ordinary-course due diligence process with the bank and our client. We anticipate that process will be finalized within the next 24 hours and we will advise accordingly.

We note that the Committee's postings to the Go Fund Me campaign site set out several evolving goals for its fundraising initiative including the following:

Put an end to Covid vaccine mandates.

For future generations.

Cost of fuel first and hopefully food and lodging for this task.

Helping to reshape this once beautiful country.

Your hard earned money is going straight to what it is needed.

Any left over donations will be donated to a credible veterans charity.

Tens of thousands of supporters have shown their confidence in both the Ottawa Convoy organization and Go Fund Me as a reliable donation platform. More than \$10 million has been donated to date.

Everyone has been surprised at the level of support both in terms of trucker participants, convoy supporters, and those making donations. The Ottawa Convoy has been in Ottawa since January 28, 2022 and the need to support the truckers' fuel, food, lodging and protest-related expenses is expected to be prolonged. The truckers have been open with the media that they are not leaving until the government vaccine mandates are lifted.

Go Fund Me's emails make specific inquiries and the Committee has instructed us to provide the following responses:

"Please confirm that funds raised will only go to reimburse the fuel costs of convoy participants:

(1) for their travel to Ottawa (not any other locations or with any other convoys)?"

The funds will be used for reimbursement of fuel, food, lodging and related expenses for the Ottawa Convoy as described in the Go Fund Me posts for the campaign including those expenses that are continuing to be incurred by the Ottawa Convoy in Ottawa.

"(2) who engage in peaceful and lawful protests, i.e., no vandalism of property, no blockades of roads and highways, etc.?"

The truckers and their supporters have the legal right to protest peacefully that is protected by section 2 of Canada's Charter of Rights and Freedoms. The Ottawa Convoy has always been clear that it only supports peaceful assembly. Their intention is not to reimburse those committing unlawful or criminal acts.

- Does the prior decision to not reimburse food and shelter expenses still hold?"

We have canvassed the Committee and they advised that they did not make such a decision. The Committee's posts have included requests for donations for food and lodgings.

"- Do you plan on posting an update to the fundraiser to reiterate that protests should remain peaceful, you do not condone any acts or threats of violence and that individuals suspected of engaging in illegal activity during the protests will not be eligible to receive funds?"

The Ottawa Convoy has consistently, repeatedly, and publicly posted that unlawful activity will not be condoned. As has been demonstrated the organizer, participants and supporters believe in peaceful and lawful protest and have always been clear at every opportunity that

unlawful conduct is not condoned. The Ottawa Committee has also been clear that unlawful conduct will undermine the goals.

“- You have requested another transfer of funds:

(1) How much of the initial \$1M of transferred funds has been distributed to participants and to how many participants?”

These Go Fund Me questions were posed to the Committee on February 1, 2022. However, it was not until February 2, 2022, that the funds were received. The intention is to transfer the funds to the Convoy Corp so proper disbursement and accounting is completed.

We have recommended to the Committee that the monies received today be treated by the Committee as trust funds to be transferred to the Freedom 2022 bank account for disbursement in accordance with the posted objects. This will ensure provision of proper bookkeeping, accounting and legal oversight of the disbursement of funds.

“(2) How much are you requesting for this second transfer of funds?”

The Committee is not requesting a further release at this time as the Committee continues to complete the establishment of the banking arrangements for Convoy Corp. The Committee and its accountant anticipate that the process will be completed in the next 24 hours. Once we provide you with confirmation that this has occurred, the Committee requests that the full balance is transferred to the Convoy Corp bank account.

“(3) Has the distribution plan for this second transfer of funds changed at all?”

Please see response above.

“(4) Approximately how many participants do you anticipate this second transfer of funds will cover?”

The truckers in the Ottawa Convoy have been notified a number of times of the Committee’s requirement for participants to register with designated “road captains” and provide receipts in order to be eligible for reimbursement. An assessment of the reimbursement claims would be required to make this estimate.

“(5) Has an organization bank account been set up or are you requesting we transfer the funds to your personal bank account, as we did with the first \$1M?”

See above.

“- Have you begun considering which charitable organization(s) will receive the remaining funds after distribution to participants? Please provide us with their names before announcing publicly as we will first need to verify on our end that they are registered charities in good standing.”

As Go Fund Me can appreciate this impromptu volunteer organization has been extremely busy with the Ottawa Convoy. The Committee has not yet selected the veteran organizations but welcomes Go Fund Me assisting in the due diligence review regarding the selection of those organizations.

"Lastly, we wanted to let you know that, as is our standard practice in potentially volatile situations like this, we will be reaching out to local law enforcement to obtain information on the individuals suspected of engaging in illegal activity during the protests. We will provide as much information as possible regarding the individuals to you so that you can ensure they do not receive a disbursement of money from your fundraiser. It is very important that funds are only distributed to those who engage in peaceful protesting as our platform cannot be used to fund violence, vandalism or illegal activities. This is against our Terms of Service."

We welcome your due diligence process and any information you can provide to ensure that anyone who engaged in illegal activities will be disqualified from funding. Participants in the Ottawa Convoy have been law abiding and peaceful.

The Committee and Convoy Corp are committed to transparency and accountability. The Committee recognizes that the current Government of Canada opposes the Ottawa Convoy's goals and that Go Fund Me has been targeted with complaints and social media attacks. We continue to work with you to ensure accountability.

We trust this information satisfies your inquiries.

We look forward to Go Fund Me immediately lifting the current suspension on this campaign and the timely release of the funds donated by the tens of thousands of supporters of this campaign.

Yours truly,

A handwritten signature in black ink, appearing to read 'KEITH WILSON', with a large, stylized flourish extending from the end of the signature.

KEITH WILSON, Q.C.
IKW/sc

cc: Client

Attachment